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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

A.M., an individual,

Plaintiff,

vs.

OMEGLE.COM LLC,

Defendant.

Case No. 3:21-cv-01674-MO

**JOINT MOTION FOR EXTENSION OF  
DISCOVERY & PTO DEADLINES**

**JOINT MOTION**

Pursuant to Fed. R. Civ. P. 16, LR 16-3 and the Court's instruction (*see* ECF No. 63), the parties jointly propose the following revised case deadlines (*see* ECF Nos. 4 & 31) as follows:

Amendment of Pleadings and Joining of All Parties	February 28, 2023
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Completion of Discovery	July 31, 2023
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Filing Dispositive Motions	August 31, 2023
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Joint ADR Report:

Plaintiff proposes 30 days following Order on dispositive motions

Defendant proposes July 31, 2023

Expert Disclosures/Discovery	30 days following Order on dispositive motions
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Joint Proposed Pretrial Order	30 days following Order on dispositive motions
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Trial

Plaintiff proposes November 13, 2023

Defendant proposes that the Court set the date

**CONCLUSION**

For the foregoing reasons, the Court should modify the existing case deadlines (ECF Nos. 4 & 31) as set forth above.

Dated this 4<sup>th</sup> day of January, 2023.

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s/ Barbara C. Long

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Dated this 4<sup>th</sup> day of January, 2023.

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